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Attorneys for Plaintiff
JOHN DOE

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

JOHN DOE,

Plaintiff,

v.

COUNTY OF SOLANO, et al.,

Defendants.

Case No. 2:23-cv-00180-AC

**SECOND STIPULATION AND
[PROPOSED] ORDER CONTINUING
NON-TRIAL DEADLINES**

Pursuant to Federal Rules of Civil Procedure 16(b)(4) and Eastern District of California Local Rules 143, plaintiff John Doe (“Plaintiff”) and defendants County of Solano, Armando Espinoza, Stephanie Bachman, Jose Naranjo, Aaron Neisingh, Anthony Posadas, and Scott Smyth (collectively, “Defendants”) (all parties, collectively, the “Parties”) stipulate as follows:

1. Plaintiff filed his complaint against defendants County of Solano, Armando Espinoza and Stephanie Bachman (originally “Stephanie M. Garcia”) on December 28, 2022 in the Superior Court of the State of California, County of Solano. Dkt. No. 1, Ex. A. The complaint included doe defendants.

2. Defendants removed the action to this Court on January 30, 2023. Dkt. No. 1.

3. The Court entered a scheduling order on June 23, 2023. Dkt. No. 15.

4. After discovery aimed at identifying doe defendants, by stipulation and with the Court's permission, Plaintiff filed a first amended complaint on January 3, 2024. Dkt. No. 28.

5. Pursuant to the stipulation of the Parties, on March 4, 2024, the Court continued the trial date to May 12, 2025 and also continued the attendant deadlines. Dkt. No. 38.

6. Since this lawsuit was initiated, Plaintiff's counsel has been retained by four additional alleged victims of sexual assault perpetrated Solano County Jail inmate Kurt Alan DaSilva, the same person who Plaintiff alleges sexually assaulted him in the Solano County Jail.

7. The Parties have been meeting and conferring regarding whether it may be possible to reach a global settlement of this case and the nascent cases of the four additional alleged victims. Additional time is necessary to explore this possibility, and to complete the remaining fact and expert discovery if settlement appears unlikely. Therefore, the Parties believe it is prudent and in the interest of economy to continue the non-trial deadlines by approximately three months.

8. The Parties propose the following continued schedule:

Event	Date
Motions to Compel Heard Not Later Than	January 22, 2025
Discovery Completed	February 3, 2025
All Non-Discovery Law and Motion	February 26, 2025
Initial Expert Disclosures	February 17, 2025
Rebuttal Expert Disclosures	March 19, 2025
Final Pretrial Conference	April 9, 2025 (unchanged)
Jury Trial	May 12, 2025 (unchanged)

It is so stipulated.

Dated: September 26, 2024

EMANUEL LAW GROUP

By: /s/ Pamela E. Glazner
Pamela E. Glazner
Attorneys for Plaintiff JOHN DOE

1
2 Dated: September 27, 2024

HAWKINS PARNELL & YOUNG, LLP

3 By: /s/ Danielle K. Lewis (authorized on 9/27/2024)
4 Danielle K. Lewis
5 Attorneys for Defendants COUNTY OF
6 SOLANO, ARMANDO ESPINOZA and
7 STEPHANIE BACHMAN, JOSE NARANJO,
8 AARON NEISINGH, ANTHONY POSADAS,
9 and SCOTT SMYTH

10 **[PROPOSED] ORDER**

11 The Court, having reviewed the foregoing Stipulation, and good cause appearing therefor, here
12 by orders as follows:

13 1. All discovery shall be completed by February 3, 2025. Motions to compel must be
14 heard no later than January 22, 2025.

15 2. Initial expert disclosures shall be made on or before February 17, 2025; rebuttal
16 expert disclosures on or before March 19, 2025.


17 3. All law and motion, except as to discovery, shall be completed as described in the
18 Court's original June 23, 2023 Pretrial Scheduling Order (Dkt. No. 15.) on or before February 26,
19 2025.

20 4. The final pretrial conference date of April 9, 2025 and the jury trial date of May 12,
21 2025 remain unchanged.

22 5. Failure to comply with the terms of this order may result in the imposition of monetary
23 and all other sanctions within the power of the court, including dismissal or an order of judgment.

24 IT IS SO ORDERED.

25 DATED: September 27, 2024

26 
27 ALLISON CLAIRE
28 UNITED STATES MAGISTRATE JUDGE